

GREENBERG TRAURIG, LLP
10845 Griffith Peak Dr., Suite 600
Las Vegas, NV 89135

MARK G. TRATOS, ESQ.
Nevada Bar No. 1086
BETHANY L. RABE, ESQ.
Nevada Bar No. 11691
GREENBERG TRAURIG, LLP
10845 Griffith Peak Dr., Suite 600
Las Vegas, Nevada 89135
Telephone: (702) 792-3773
Facsimile: (702) 792-9002
Email: tratosm@gtlaw.com
rabeb@gtlaw.com

Attorneys for Defendants

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PROCARE HOSPICE OF NEVADA, LLC, a
Nevada limited liability company,

Plaintiff,

v.

ONECARE HOSPICE, LLC, a Nevada limited
liability company; ONECARE HEALTH
SERVICES, LLC, a Nevada limited liability
company; ONECARE HOME HEALTHCARE,
LLC, a Nevada limited liability company; and
COMMUNITY HOME HEALTHCARE, LLC,
a Nevada limited liability company, DOES 1-
10; and ROE CORPORATIONS 1-10,
inclusive,

Defendants.

Case No.: 2:21-CV-00417

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING DEADLINE TO
RESPOND TO COMPLAINT**

(FIRST REQUEST)

Plaintiff ProCare Hospice of Nevada, LLC (“Plaintiff”) and Defendants OneCare Hospice LLC, OneCare Health Services, LLC, OneCare Home Healthcare, LLC, and Community Home Healthcare, LLC (collectively “Defendants”), hereby stipulate and agree as follows:

1. Plaintiff commenced this action in the United States District Court, District of Nevada, on March 12, 2021.

2. Defendants were served with the summons and complaint on March 17, 2021.

///

GREENBERG TRAURIG, LLP
10845 Griffith Peak Dr., Suite 600
Las Vegas, NV 89135

3. The deadline for Defendants to answer or otherwise respond to the complaint is currently April 7, 2021.

4. Plaintiff has informed Defendants that it intends to file an amended complaint shortly. As such, the parties hereby agree that (1) counsel for Defendants will accept service of the amended complaint; and (2) Defendants will not respond to the complaint filed on March 12, 2021, but will respond in the ordinary course to the amended complaint. This is the first stipulation for extension of time.

5. By so stipulating, no party waives any claims, rights or defenses and each party expressly reserves all rights and defenses under Fed. R. Civ. P. 8 and 12.

6. This is the first extension of time requested. This stipulation is made in good faith and not in an attempt to delay proceedings.

DATED this 7th day of April, 2021.

DATED this 7th day of April, 2021.

HUTCHISON & STEFFEN, PLLC

GREENBERG TRAURIG, LLP

/s/ Patricia Lee

/s/ Bethany L. Rabe

Patricia Lee (8287)
Joseph R. Ganley (5643)
Peccole Professional Park
10080 West Alta Drive, Suite 200
Las Vegas, Nevada 89145
Attorneys for Plaintiff

Mark G. Tratos, Esq. (NV Bar No. 1086)
Bethany L. Rabe, Esq. (NV Bar No. 11691)
10845 Griffith Peak Dr., Suite 600
Las Vegas, Nevada 89135
Attorneys for Defendants

ORDER

IT IS SO ORDERED:


United States Magistrate Judge

Dated: April 8, 2021